



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

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217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

Bagcraft Papercon I, L.L.C.
Attn: Patrick Lueth, Operations Manager
3900 West 43rd Street
Chicago, Illinois 60632

Application No.: 10110035

I.D. No.: 031600ACL

Applicant's Designation:

Date Received: November 23, 2010

Subject: Bagger Line #172

Date Issued: January 12, 2011

Location: 3900 West 43rd Street, Chicago

This Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of a new bagger line, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.1 Description

The bagger line consists of a flexographic printing section and a bag-making section. The paper feedstock for the bags is prepared in the flexographic printing section. The bag-making section applies adhesives to the back seam and bottom seam areas of the bag and then forms the actual bag.

1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Control
Bag Line #172	Bagger line consisting of a flexographic printing section and a bag-making section.	None

1.3 Applicability Provisions and Emission Standards

- a. The "affected line" is the new bagger line described in Conditions 1.1 and 1.2.
- b. i. The affected line is subject to 35 IAC 218.401(a)(2)(B), which provides that no owner or operator shall apply at any time any coating or ink unless the volatile organic material (VOM) content does not exceed one of the following limitations:
- A. 0.8 kg VOM/kg (0.8 lbs VOM/lb) solids applied; or
 - B. 0.16 kg VOM/kg (0.16 lbs VOM/lb) inks and coatings applied.

- ii. The affected line is subject to 35 IAC 218.401(d), which provides that no owner or operator shall cause or allow VOM containing cleaning materials, including used cleaning towels, associated with the affected line to be kept, stored, or disposed of in any manner other than in closed containers, or conveyed from one location to another in any manner other than in closed containers or pipes, except when specifically in use.
- c. The affected line is subject to 35 IAC 212.321(a), which provides that no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c).

1.4 Non-Applicability Provisions

- a. Upon achieving compliance with 35 IAC 218.401, the affected line is not required to meet 35 IAC Part 218, Subpart G (Section 218.301 or 218.302). [35 IAC 218.402(c)]
- b. This permit is issued based on this project not being a major modification for purposes of 35 IAC Part 203: Major Stationary Sources Construction and Modification (MSSCAM) because it will not be accompanied by significant increases in emissions of VOM.
- c. This permit is issued based upon the affected line not being subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) for Printing and Publishing, 40 CFR 63 Subpart KK and for Paper and Other Web Coating, 40 CFR 63 Subpart JJJJ, because the source is considered a minor source of hazardous air pollutants (HAP).

Note: The source's CAAPP permit contains provisions limiting HAP emissions (See Condition 5.5.2 of the source's CAAPP permit, Permit Number 95050147) as well as other requirements to verify minor source status for HAP emissions, which will continue to apply to the source. Accordingly, the addition of the affected line will not change the minor source status of the source.

1.5 Production and Emission Limitations

- a.
 - i. VOM usage for the affected line shall not exceed 0.4 tons/month and 3.4 tons/year.
 - ii. VOM emissions from the affected line shall not exceed 0.4 tons/month and 3.4 tons/year.

- b. Compliance with the annual limits shall be determined from a running total of 12 months of data.

1.6 Testing Requirements

The VOM content of each coating and ink shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105 to establish the records required under 35 IAC 218.404. [35 IAC 218.404(a)]

1.7 Recordkeeping Requirements

- a. The Permittee shall collect and record all of the following information each day for the affected line and maintain the information at the source for a period of three years: [35 IAC 218.404(c)(2)]
 - i. The name and identification number of each coating and ink as applied on the affected line. [35 IAC 218.404(c)(2)(A)]
 - ii. The VOM content of each coating and ink as applied each day on the affected line. [35 IAC 218.404(c)(2)(B)]
- b. VOM usage and VOM emissions for the affected line (tons/month and tons/year) with supporting calculations and documentation.

1.8 Reporting Requirements

- a. Upon initial start-up of the affected line, the Permittee shall certify to the Agency that the affected line will be in compliance with 35 IAC 218.401(a) on and after the initial start-up date. Such certification shall include: [35 IAC 218.404(c)(1)]
 - i. The name and identification number of each coating and ink as applied on the affected line. [35 IAC 218.404(c)(1)(A)]
 - ii. The VOM content of each coating and ink as applied each day on the affected line. [35 IAC 218.404(c)(1)(B)]
- b. The Permittee shall notify the Agency in the following instances: [35 IAC 218.404(c)(3)]
 - i. Any record showing violation of 35 IAC 218.401(a) shall be reported by sending a copy of such record to the Agency within 30 days following the occurrence of the violation. [35 IAC 218.404(c)(3)(A)]
 - ii. At least 30 calendar days before changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(a) to 35 IAC 218.401(b) or (c), the Permittee shall comply with all requirements of subsection 35 IAC 218.404(d)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 IAC 218.401 from 35 IAC 218.401(a) to 35 IAC 218.401(b) or (c),

the Permittee shall comply with all requirements of 35 IAC 218.404(d) or (e), respectively. [35 IAC 218.404(c)(3)(B)]

- c. Upon initial start-up of the affected line, the Permittee shall submit a certification to the Agency describing the practices and procedures that the owner or operator will follow to ensure compliance with the limitations of 35 IAC 218.401(d). [35 IAC 218.404(g)(1)]
- d.
 - i. The Permittee shall notify the Agency of any violation of 35 IAC 218.401(d) by sending a description of the violation and copies of records documenting such violations to the Agency within 30 days following the occurrence of the violation. [35 IAC 218.404(g)(2)]
 - ii. All records required by 35 IAC 218.404(g) shall be retained for at least three years and shall be made available to the Agency upon request. [35 IAC 218.404(h)]
- e. Except as specified in a particular provision of this permit or in a subsequent CAAPP Permit for the plant, notifications and reports for deviation from applicable emission standards shall include at least the following information: the date and time of the event, a description of the event, information on the magnitude of the deviation, a description of the corrective measures taken, and a description of any preventative measures taken to prevent future occurrences.

1.9 Authorization to Operate

The affected bagger line may be operated under this construction permit until renewal or reissuance of the source's CAAPP permit to address this line. This condition supersedes Standard Condition 6.

It should be noted that the press dryer on the affected line is exempt from state permit requirements, pursuant to 35 IAC 201.146(fff). The dryer is also an insignificant activity under the Clean Air Act Permit Program, pursuant to 35 IAC 201.210(a)(4).

If you have any questions on this permit, please contact Jason Schnepf at 217/782-2113.

Edwin C. Bakowski

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: *January 12, 2011*

ECB:JMS:psj

cc: Region 1



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

**STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS
ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless superseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.
2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.
3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.
4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:
 - a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,
 - b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,
 - c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,
 - d. to obtain and remove samples of any discharge or emissions of pollutants, and
 - e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.
5. The issuance of this permit:
 - a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,
 - b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,
 - c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,
 - d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

- e. in no manner implies or suggests that the Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment or facility.
6. a. Unless a joint construction/operation permit has been issued, a permit for operation shall be obtained from the Agency before the equipment covered by this permit is placed into operation.
- b. For purposes of shakedown and testing, unless otherwise specified by a special permit condition, the equipment covered under this permit may be operated for a period not to exceed thirty (30) days.
7. The Agency may file a complaint with the Board for modification, suspension or revocation of a permit:
- a. upon discovery that the permit application contained misrepresentations, misinformation or false statements or that all relevant facts were not disclosed, or
 - b. upon finding that any standard or special conditions have been violated, or
 - c. upon any violations of the Environmental Protection Act or any regulation effective thereunder as a result of the construction or development authorized by this permit.

or assistance in preparing a permit application contact the Permit Section.

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O. Box 19506
Springfield, Illinois 62794-9506

a regional office of the
aid Operations Section.
a regional offices and their
areas of responsibility are
shown on the map. The
addresses and telephone
numbers of the regional
offices are as follows:

Illinois EPA
Region 1
Bureau of Air, FOS
3511 West Harrison
Des. Plains, Illinois 60016
147/294-4000

Illinois EPA
Region 2
415 North University
Springfield, Illinois 61114
219/693-5463

Illinois EPA
Region 3
609 Mall Street
Illinsville, Illinois 62234
87346-5120

